

**IN THE UNITED STATE DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ALLAN BARREDA, and all other Plaintiffs )  
similarly situated known and unknown, )  
  )  
  )  
Plaintiffs,                                   )      CIVIL ACTION  
  )  
  )  
v.    )      Case No. 08-CV-3239  
  )  
  )  
PROSPECT AIRPORT SERVICES, INC.,    )      Hon. Judge Kennelly  
  )  
  )  
Defendant.                                   )      Magistrate Judge Nolan

**DEFENDANT'S RULE 26(a)(1) DISCLOSURES**

Defendant, PROSPECT AIRPORT SERVICES, INC. ("Prospect"), by and through its attorneys Arthur M. Holtzman and Lauren Blair of Pedersen & Houpt, submit the following disclosures pursuant to Fed. R. Civ. P. Rule 26(a)(1):

1. The following information is submitted in response to Rule 26(a)(1)(A)(i), which requests the name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

<u>Name</u>	<u>Address</u>	<u>Subject(s) of Information</u>
Allan Barreda	2557 W. Winnemac Ave. Chicago, IL 60625	Information relating to each and every allegation and claim made in his Complaint and Amended Complaint.

Ronald Claypool	c/o Pedersen & Houpt 161 N. Clark St., #3100 Chicago, IL 60601	Information relating to: Plaintiff's claims in the Complaint and Amended Complaint; Prospect's Answer to the Amended Complaint and Affirmative Defenses; Plaintiff's employment with Prospect; Prospect's employment policies and practices, including, but not limited to, those concerning skycaps' hours of work and overtime, meal periods, rates of pay/wage compensation, and tip reporting requirements; the Job Orientation Guidelines and Work Rules ("Employee Handbook") ("Employee Handbook"); the Collective Bargaining Agreement ("CBA") between Prospect and District 8 of the International Association of Machinists and Aerospace Workers AFL-CIO ("Union").
King Strobel Mario Zabrodzki Vladimir Raikov Radek Ziuzia Bozena Fiszer Tom Love	c/o Pedersen & Houpt 161 N. Clark St., #3100 Chicago, IL 60601	Information relating to: Prospect's employment policies and practices, including, but not limited to, those concerning skycaps' hours of work and overtime, meal periods, rates of pay and wage compensation, and tip reporting requirements; Plaintiff's hours of work, overtime, meal periods, rates of pay/wage compensation, and tip reporting requirements; the Employee Handbook; the CBA's grievance, hours of work and overtime, and wage provisions.
Theodore Pappas		Information relating to: the CBA, including, but not limited to, its grievance procedures; Plaintiff's failure to comply with the CBA's grievance procedures; grievances; Prospect's employment policies and practices, including, but not limited to, those concerning skycaps' hours of work and overtime, meal periods, rates of pay/wage compensation, and tip reporting requirements.

2. The following information is submitted in compliance with Rule 26(a)(1)(A)(ii), which requests a copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

**The following information is provided subject to, and without waiving, any and all protections and/or privileges, including but not limited to the attorney-client privilege, the attorney work product doctrine, any and all other protections of privilege and confidentiality.**

<u>Description by Category</u>	<u>Location</u>
Prospect's Employee Handbook	Pedersen & Houpt 161 N. Clark St., #3100 Chicago, IL 60601
Prospect's Break/Meal Period Policy dated November 2004	Pedersen & Houpt
CBA dated February 13, 2005	Pedersen & Houpt
Prospect's Accountability Policy dated August 2007	Pedersen & Houpt
IRS Publication 1244, entitled "Employee's Daily Record of Tips and Report to Employer," and a copy of Form 4070 (Employee's Report to Tips to Employer) and Form 4070A (Employee's Daily Record of Tips)	Pedersen & Houpt
Plaintiff's time cards for the period of July 29, 2007 through July 19, 2008	Pedersen & Houpt
Plaintiff's paystubs and payroll records for the period of July 29, 2007 through July 19, 2008	Pedersen & Houpt
Plaintiff's 2007 W-2	Pedersen & Houpt
Plaintiff's personnel file	Pedersen & Houpt

3. The following information is submitted in compliance with Rule 26(a)(1)(A)(iii), which requests a computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

Defendant has not claimed any damages.

4. The following information is submitted in compliance with Rule 26(a)(1)(A)(iv), which requests for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

None exists.

**Prospect's investigation is on-going, and, thus, the foregoing disclosures are subject to modification and supplementation. Prospect reserves the right to supplement these disclosures in accordance with Rule 26(e).**

Respectfully submitted,  
PROSPECT AIRPORT SERVICES, INC.

By:s/ Lauren Blair  
One of Its Attorneys

Arthur M. Holtzman (A.R.D.C. #1252844)  
Lauren Blair (A.R.D.C. #6224489)  
PEDERSEN & HOUPT  
161 North Clark Street  
Suite 3100  
Chicago, Illinois 60601  
(312) 641-6888